EXPERT REPORT OF HAL PORET IN MATTER OF NAIL ALLIANCE, LLC V. POLY-GEL, LLC

SURVEYS TO ASSESS WHETHER PURCHASERS OF PROFESSIONAL NAIL TREATMENT PRODUCTS ARE LIKELY TO CONFUSE GELISH POLYGEL NAIL TREATMENT PRODUCTS WITH COUNTERCLAIM-PLAINTIFF'S POLYGEL MARK OR COUNTER-PLAINTIFF'S PRODUCTS

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BACKGROUND AND PURPOSE

Counterclaim Plaintiff (Counter-Plaintiff) alleges that it has used and continues to use the names or marks (terms I use interchangeably herein for convenience) Poly-Gel and PolyGel in connection with Counter-Plaintiff's products. According to Counter-Plaintiff's website, Counter-Plaintiff has six product lines/brands, each of which are marketed to healthcare professionals (or to the art and education markets) and are described as follows:

- NATRAGEL skincare products for skincare professionals such as dermatologists and plastic surgeons
- THERMOACTIVE a medical line of reimbursable brace technology (braces)
- FLEXIKOLD a cold therapy gel pack
- NATRACURE products for injury recovery and chronic pain
- GELSMART gel-based foot and skincare products marketed to healthcare professionals
- GELPRESS a gel printing technology for the art and education market

Counterclaim Defendants (Counter-Defendants) are nail products companies which promote a variety of professional nail products and related products sold to nail professionals – namely nail salons and nail technicians. Counter-Defendants use the term POLYGEL in connection with its GELISH brand line of professional nail treatment products. Examples of the relevant GELISH products are shown here:



Counter-Plaintiff has alleged that Counter-Defendants' use of the term POLYGEL in connection with the GELISH line of professional nail treatment products creates a likelihood of confusion with respect to Counter-Plaintiff's POLYGEL marks.

Counsel for Counter-Defendants retained me to design and conduct a survey to assess the extent to which, if at all, prospective purchasers of Counter-Defendants' professional nail treatment products that use the term POLYGEL are likely to confuse such products with Counter-Plaintiff's POLYGEL mark, including to assess whether nailcare professionals are even aware of Counter-Plaintiff's mark or products (since Counter-Defendants' prospective customers could not confuse Counter-Defendants' products with Counter-Plaintiff if they are not even aware of Counter-Plaintiff's mark or products). This report details the design, methodology, execution and results of the

survey I conducted. As discussed in more detail below, the survey showed a 0% confusion rate and a 0% rate of awareness of Counter-Plaintiff's POLYGEL mark among nailcare professionals. Accordingly, the survey demonstrates that nailcare professionals are not likely to be confused by Counter-Defendants' GELISH products that use the term POLYGEL, as such nailcare professionals do not associate the term POLYGEL with Counter-Plaintiff or any of Counter-Plaintiff's products and would not make any mistaken mental connection to Counter-Plaintiff's use of the mark POLYGEL.

In the course of designing my surveys and preparing this report, I reviewed the following materials: (1) First Amended Complaint; (2) proposed Second Amended Complaint and Exhibits; (3) Answer to First Amended Complaint, Affirmative Defenses and Counterclaim; (4) Polygel.com website; (5) Gelish.com website; (6) natracure.com website; (7) natragel.com website; (8) thermoactive.com website; (9) gelmart.com website; and (10) gelpress.com website. I also conducted numerous online searches for professional nail treatment products generally and Counter-Defendants' Gelish products specifically and examined the results.

The fee charged for the survey and this report is \$50,000. Any additional work in connection with this matter is being charged at my standard rate of \$675 per hour. Payment is not contingent upon the nature of my opinions or the outcome of any proceeding.

STUDY AUTHORSHIP AND QUALIFICATIONS

This study was designed, supervised, and implemented by Hal L. Poret, President at Hal Poret, LLC.

I have personally designed, supervised, and implemented over 1,000 surveys regarding the perceptions and opinions of consumers. Over 300 have involved consumer perception with respect to trademarks, and over 500 have been conducted online. I have personally designed numerous studies that have been admitted as evidence in legal proceedings and I have been accepted as an expert in survey research on numerous occasions by U.S. District Courts, the Trademark Trial and Appeal Board, and the National Advertising Division of the Council of Better Business Bureaus (NAD).

I am a member of the American Association of Public Opinion Research, publisher of *Public Opinion Quarterly* and the *Journal of Survey Statistics and Methodology*; the International Trademark Association; and the National Advertising Division of the Council of Better Business Bureaus (NAD). I routinely conduct market research surveys for a variety of small to large corporations and organizations.

I have frequently spoken at major intellectual property and legal conferences on the topic of how to design and conduct surveys that meet legal evidentiary standards for reliability, including conferences held by the International Trademark Association (INTA), American Intellectual Property Law Association, Practicing Law Institute, Managing Intellectual Property, Promotions Marketing Association, American Conference Institute, and various bar organizations.

In addition to my survey research experience, I hold bachelors and masters degrees in mathematics and a J.D. from Harvard Law School. Additional biographical material, including lists of testimony and publications, is provided in Appendix A.

STUDY DESIGN

A total of 200 respondents participated in this online survey among prospective purchasers of professional nail treatment products – namely nail salon owners/managers/employees, nail technicians, and others who work in a business that does nail treatments.¹

The survey followed a highly standard and well-accepted survey format in which the allegedly confusing products (Counter-Defendants' Gelish Polygel products) are shown to prospective purchasers, and respondents are questioned to determine if they make a mistaken mental connection to the senior mark/products on their own. Such a format is the ideal method for assessing likelihood of confusion in scenarios where the parties' products are not directly competing, substantially overlapping, or otherwise significantly proximate in the marketplace. While Counter-Plaintiff alleges in its counterclaims that the parties' products appear together in the marketplace,² it is apparent that the parties' products are different types of products that are sold to different customer bases through primarily different channels. Counter-Defendants' products are nail treatment products that are marketed to nailcare professionals through nailcare industry distributors and related channels. Counter-Plaintiff's products, on the other hand, are mostly healthcare products for healing or recovery from injury or pain that are marketed to healthcare professionals, or printing products

¹ <u>See</u> the Sampling section of this report for more information regarding who qualified for and completed the survey.

² Counter-Plaintiff's claim that the products appear in proximity in the marketplace appears to be based solely on the alleged prospect of encountering both parties if searching for the term "Polygel" within a particular category on a site such as Amazon. The mere presence of both parties' products online does not on its own make the products "proximate" in any meaningful sense, if they are not competing or substantially overlapping products and are typically promoted to different consumers through different industry channels. See Jerre Swann, Eveready and Squirt - Cognitively Updated, 106 TMR 727 at 743 (2016) (Surveys where both parties' marks are shown in close proximity are only appropriate if the parties' marks would be encountered in close proximity in the actual marketplace with "appreciable frequency.").

marketed to the education and art markets. Accordingly, nail care professionals who are considering purchase of Counter-Defendants' Gelish Polygel products would not be likely to also encounter or consider Counter-Plaintiff's products or mark in close proximity with Counter-Defendants' products, and a survey that showed both the Counter-Defendants' and Counter-Plaintiff's products in close proximity in connection with a purchase situation would be overly artificial and inappropriate. To simulate whether a nail care professional would be confused by Counter-Defendants' nail treatment products, showing only the challenged Gelish Polygel products without also simultaneously showing Counter-Plaintiff's products is a far more realistic and superior replication of marketplace conditions.

As this was an online survey, all the instructions and questions were displayed on respondents' computer screens and each question appeared on its own screen.

After a series of initial screening questions, all respondents were prompted:

On the next screen we are going to show you an image of a set of nail treatment products. Please take your time to review the products. The continue button will not be enabled until 15 seconds have passed to ensure that you have enough time to look at the image.

When you have finished, you will be asked some questions. For any question, if you have no opinion or do not know then please indicate so. Please do not guess.

On a new screen, respondents were then instructed to view the set of nail treatment products:³

Please take your time to review this image of nail treatment products.

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³ The image below has been reduced in size to appear in this report. In the programmed survey, this image appeared large across respondents' screens. Screenshots of how the survey appeared to respondents are provided in Appendix C and the original image used for programing the survey is provided in Appendix E.



This image gave respondents the opportunity to see four instances of the allegedly infringing term POLYGEL as it is presented on actual Gelish products and packaging.

After fifteen seconds elapsed, the following instruction appeared beneath the image:

Before continuing with the survey, please indicate whether or not you have viewed the image clearly.

- I viewed the image clearly
- I am unable to view the image clearly

Respondents viewed the image for a minimum of fifteen seconds and confirmed they viewed the image clearly before continuing with the survey. This is a standard quality assurance procedure to ensure respondents successfully viewed the products and marks at issue for an amount of time that allows them to meaningfully participate in the survey.

Upon continuing, respondents were asked:

What company or brand do you think makes or puts out the products you were just shown, if you have an opinion?

If you are thinking of more than one company or brand, you may enter answers in separate boxes below. If you don't know or have no opinion, you may select that option.

Respondents could type in up to three different answers or select "Don't know/no opinion."

Next, all respondents were asked:

Do you think that the products you were just shown are sponsored or approved by, or affiliated with, any other company or brand?

- Yes, I do
- No, I do not
- Don't know/No opinion

Respondents who answered, yes, were then asked:

You answered that you think that the products you were just shown are sponsored or approved by, or affiliated with, another company or brand.

What other company or brand?

If you are thinking of more than one company or brand, please enter each one in a separate box below.

Respondents could type in up to five different answers or select "Don't know."

Respondents who typed in at least one company or brand were then instructed:

Each company or brand you named is listed below. For each one, please explain what makes you think that the products you were just shown are sponsored or approved by, or affiliated with, that company or brand.

Please be as specific and detailed as possible.

Beneath this instruction, respondents were shown the answers they provided in response to the previous question and next to each answer, they explained what makes them think the products they were shown are sponsored or approved by, or affiliated with, the company or brand they named.

Next, all respondents were asked:

Are you aware of any other products or brands that you think are made or put out by the same company as the products we showed you?

- Yes, I am
- No, I am not
- Don't know/No opinion

Respondents who answered, yes, were then asked:

You answered that you are aware of other products or brands that you think are made or put out by the same company as the products we showed you.

What other products or brands?

If you are thinking of more than one, please enter each one in a separate box below.

Respondents could type in up to five different answers or select "Don't know."

Finally, respondents were asked an additional question to determine whether they are even aware of any other products (besides the Gelish products shown in the survey) that use the term PolyGel – in particular whether they connect the term PolyGel to any of Counter-Plaintiff's products. First, respondents were asked:

Are you aware of any other products that use the term **PolyGel**?

Respondents who answered affirmatively were then instructed:

Using the boxes below, please describe any other products that you are aware of that use the term **PolyGel**.

Please be as specific and detailed as possible and identify what <u>type</u> of product you are thinking of.

This concluded the survey for all respondents.

Contemplation of a Control Group

A Control Group was initially contemplated for this survey. However, I ultimately determined that there was no reason to run a Control Group. The purpose of a Control Group would have been to determine to what extent any potential confusion shown in a Test Group should be dismissed or discounted as survey noise – i.e., guessing or

otherwise providing answers for reasons unrelated to trademark similarity. A Control Group would measure the noise level in the survey. This "noise level" would then be <u>deducted</u> from the Test Group's result to arrive at a net level of confusion that can be attributed specifically to the trade dress at issue. However, given that the Test Group showed zero confusion, there was no reason to run a Control Group, which can only result in <u>lowering</u> the net confusion level in the survey. The resulting confusion rate of 0% shows a lack of confusion even without taking any potential noise into consideration.

Screenshots of the survey will be provided in Appendix C.

SUMMARY OF KEY FINDINGS

This section details certain key survey findings. Other survey results are discussed further in the Detailed Findings section below.

No respondents confused Counter-Defendants' Gelish PolyGel products with Counter-Plaintiff or its products in response to any questions.

No respondents indicated awareness of the use of the term PolyGel in connection with any products of Counter-Plaintiff.

Based on the survey results, it is my opinion that there is no likelihood of confusion among purchasers of professional nail treatment products regarding the source of the Gelish PolyGel products and that there is no awareness of any use of the term PolyGel in connection with Counter-Plaintiff's products among purchasers of professional nail treatment products.

<u>See</u> Detailed Findings section below for additional information on results. The full data will be provided in its original electronic form in Appendix D.

THE RELEVANT UNIVERSE OF INTEREST

The appropriate sample universe for this survey consisted of individuals who work at businesses that do nail treatments. Most members of the sample universe also met additional criteria specified below, including that they have personal involvement in the selection of nail treatment products to purchase.

First, after initial demographic questions, including confirmation that respondents are female, all potential respondents were asked:

Which of the following types of products, if any, have you personally purchased in the past 6 months, either for yourself or for use in your work? (Select all that apply or "none of these.")

The following table displays the list of randomized options available from which respondent could select and the proportion of final respondent who selected each:

Products Purchased Past 6 Months		
Base N=200	N	%
Nail treatment product	172	86.0%
Facial treatment product	153	76.5%
Hair coloring product	111	55.5%
Teeth whitening product	108	54.0%
None of these	6	3.0%

Next, all respondents were asked:

Which of the following types of products, if any, are you likely to personally purchase in the next 6 months, either for yourself or for use in your work? (Select all that apply or "none of these.")

The following table displays the list of randomized options available from which respondent could select and the proportion of final respondent who selected each:

Products Likely to Purchase in Next 6 Months		
Base N=200	N	%
Nail treatment product	174	87.0%
Facial treatment product	155	77.5%
Teeth whitening product	122	61.0%
Hair coloring product	119	59.5%
None of these	5	2.5%

All but 2 respondents selected "nail treatment product" in response to at least one of these two questions. While this was not a requirement for participation in the survey, it shows that virtually all respondents have recently purchased or are likely to purchase nail treatment products.

Next, all respondents were asked:

Do you personally work at a business that does any of the following...? (Select all that apply or "none of these.")

Hair coloring treatments
Nail treatments
Facial treatments
Teeth whitening treatments
None of these

Only respondents who selected "nail treatments" were permitted to continue with the survey. All others were terminated.

Before continuing to the main survey, all respondents were asked additional questions for classification purposes. First, respondents were asked:

Which of the following describes the place(s) where you work that does nail treatments?

(*Select all that apply*)

The following table displays the list of randomized options available from which respondent could select and the proportion of final respondent who selected each:⁴

Place of Work		
Base N=200	N	%
Nail salon or spa	151	75.5%
Full service salon	25	12.5%
Hair salon	23	11.5%
Day spa	19	9.5%
Beauty Institute or cosmetology school	12	6.0%

Next, all respondents were asked:

Which of the following best describes your job position? (*Select one response*)

The following table displays the list of randomized options available from which respondent could select and the proportion of final respondent who selected each:

Job Position		
Base N=200	N	%
Freelance or independent nail technician	68	34.0%
Employee of salon/spa	64	32.0%
Owner of salon/spa	45	22.5%
Manager of salon/spa	22	11.0%
Other (please specify) ⁵	1	0.5%

Since the confusion rate was 0% among individuals from various types of businesses that do nail treatments and among individuals with various positions, the precise distribution of interviews across type of business and job position was not material to

⁴ The figures in this table add to greater than 100% because some respondents work in more than one type of business that does nail treatments.

⁵ The one respondent who selected "other" entered "facilitator."

the results. The results could be re-weighted in any proportions and the confusion result would still be 0%.

Respondents were then asked:

Which of the following do you personally do in connection with any business that does nail treatments? (Select all that apply)

The following table displays the list of randomized options available from which respondent could select and the proportion of final respondent who selected each:

Performed in Connection with Nail Treatment Business		
Base N=200	N	%
Select which nail treatment products to purchase	192	96.0%
Nail treatments for clients	172	86.0%
Run or manage the business	69	34.5%
Front desk services/reception	62	31.0%
Other (please specify)	0	0.0%

As the above table shows, nearly all respondents (192 of 200) indicated that they are personally involved in selecting which nail treatment products to purchase, which confirms they are prospective purchasers of the relevant Gelish Polygel products. If the 8 respondents who did not indicate that they are involved in product selection/purchase were excluded from the data, it would have no meaningful impact on the survey results or my conclusions.

Next, these respondents were asked:

Which of the following best describes the ethnicity of the owner of the business where you work? (Select one response)

The following table displays the list of randomized options available from which respondent could select and the proportion of final respondent who selected each:

Ethnicity of Business Owner		
Base N=200	N	%
White/Caucasian	95	47.5%
Vietnamese	49	24.5%
Korean	25	12.5%
Chinese	4	2.0%
Other Asian	8	4.0%
Other (please specify)	17	8.5%
Prefer not to answer	2	0.0%

Since the confusion rate was 0% regardless of ethnicity of business owner, the precise distribution of interviews by ethnicity was not material to the results. The results could be re-weighted in any proportions and the confusion result would still be 0%.

This concluded the screening and classification questions for all respondents.

The actual wording of the screening questions used is shown in Appendix B.

SAMPLING PLAN

The sampling plan involved a random selection of individuals who are part of an online panel.

Online surveys are well-accepted in the field of survey research as a standard, reliable methodology. Indeed, online surveys are now the most common method of conducting market research among consumers. Businesses and other organizations routinely make decisions of importance based on the results of online survey research among

consumers and professionals, and online surveys have been accepted in evidence in numerous U.S. District Court cases. I have personally designed and executed numerous internet surveys that have been accepted by courts.

The sample of panelists used in the survey was provided by Research Now, a leading supplier of online sample for surveys. I have worked with Research Now on many surveys and have found its procedures and panels to be highly reliable. Research Now has a large and diverse panel consisting of millions of Americans and is highly regarded as a reputable source of respondents for online surveys within the field of market research. Research Now utilizes appropriate industry procedures for ensuring the integrity and quality of its panels. Research Now employs a "by-invitation-only" panel recruitment model to enroll pre-validated individuals and, therefore, maintains a panel comprised of the most credible survey takers who are less prone to self-selection bias. Quality and integrity of its research panel is also obtained and maintained in the following ways.

- It requires a double opt-in and agreement to provide truthful and well-considered answers to online market research surveys. First, potential panelists opt-in during the enrollment process, and then they are sent a follow-up email confirmation that requests the potential panelist to click a link to validate the opt-in. Then, he or she is sent a follow-up email providing access to their member account and they can begin receiving surveys.
- A unique email address is required to opt-in to the panel and physical addresses provided by panelists in the US are verified against government postal information.
- Research Now implements data quality measures by focusing on identifying and
 pursuing panelists who exhibit suspicious behaviors. This is done by identifying
 members through routine review of behaviors and sometimes with the help of its
 clients, and then evaluating a wider set of behaviors, particularly members
 profile information and survey performance.

Research Now also employs a "Three Strikes Policy" in which panelists who
commit survey offenses, such as speeding, inattentiveness, poor quality open
ends, answering inconsistencies, and selecting dummy answers, are flagged with
an "offense" code. Panelists who are flagged three times for such offenses are
disqualified from panel membership and future surveys.

Using data that had previously been collected (completely unrelated to this survey), Research Now was able to pre-identify members of its panel who had indicated that they work in nail salons or hair or other beauty salons.

Invitations were then sent targeting those pre-identified panelists. The purpose of the survey was withheld from respondents and nothing in the invitation to panelists indicated that they received the invitation because they work at a business that may do nail treatments.

Without knowing the purpose of the survey, respondents needed to meet the screening criteria to qualify for the survey. In doing so, they confirmed that they indeed are part of the Relevant Sample Universe.

The following table displays the final proportion of sample achieved by age:

Final Number of Respondents by Age		
N=200	N	%
18 - 34	44	22.0%
35 – 54	126	63.0%
55 and older	30	15.0%

These percentages match those reported in the Nails Magazine Big Book for 2017-2018.6

All respondents completing the survey were females.

The following table displays the final proportion of sample achieved by U.S. region:

Final Number of Respondents by Region			
N=200	N	%	
Midwest	39	19.5%	
Northeast	50	25.0%	
South	30	15.0%	
West	39	19.5%	
Southeast	42	21.0%	

Since the confusion rate was 0% among respondents from all age groups and all geographic regions, the precise distribution of interviews across these demographics was not material to the results. The results could be re-weighted in any proportions and the confusion result would still be 0%.

DATA PROCESSING

Data was collected by Focus Vision and made available to Hal Poret, LLC through an electronic portal on an ongoing basis. The data set showing respondents' answers to all questions will be provided in electronic form.

INTERVIEWING PROCEDURES

The online survey was programmed and hosted by Focus Vision, a company specializing in web survey programming and data collection and processing. My staff

⁶ <u>See</u> CCE08292018_000-c

and I thoroughly tested the programmed survey prior to any potential respondents receiving the invitation to participate in the survey.

DOUBLE-BLIND INTERVIEWING

The study was administered under "double-blind" conditions. That is, not only were the respondents kept uninformed as to the purpose and sponsorship of the study, but the services involved in providing the sample and administering the online interviews (Focus Vision and Research Now) were similarly "blind" with respect to the study's purpose and sponsorship.

INTERVIEWING PERIOD

Interviewing was conducted from September 11, 2018 through September 24, 2018.

QUALITY CONTROL

Several measures were implemented to ensure a high level of quality control and validation with respect to respondents taking the survey.

Upon initially entering the survey, all respondents were required to pass a test to verify that each respondent is a live person. The test employed in this survey is a CAPTCHA⁷ program that generates a task that humans can pass but current computer programs cannot. CAPTCHA is a well-known and widely-used tool in online survey research.

Upon successfully passing the CAPTCHA test, respondents were then asked to enter their year of birth and then their gender. This information was checked against the sample provider's (Research Now's) demographics on record for each respondent and any respondent providing an incorrect or inconsistent birth year and/or gender was unable to continue to the main survey.

⁷ CAPTCHA is an acronym for "Completely Automated Public Turing test to tell computers and Humans Apart."

Additionally, respondents were then asked to select their age range. Respondents who selected an age range inconsistent with their year of birth were unable to continue with the survey.

These combined steps ensured that the survey was being taken by an actual live person and that each person was paying a certain level of attention to the survey questions and taking a certain level of care in entering responses.

All respondents were also asked to select any web browsers or search engines they have used in the past three months. Respondents could select as many as applied to them from a list of ten options, including, "other," "not sure" and one fictitious name: Hagelin. Respondents who selected "Hagelin" were unable to continue. Additionally, respondents who answered that they have used all seven of the actual web browsers and search engines included on the response list, were identified as "yea-sayers" and unable to continue with the survey.⁸

The following question was also asked and permitted additional screening out of respondents who were paying insufficient attention or clicking responses indiscriminately:

For quality assurance, please type the word "west" in the blank next to the "Other" box below and then click to continue.

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Other _____

⁸ "Yea-sayers" in surveys are typically defined as respondents who answer affirmatively to questions, regardless of their belief.

Respondents who selected "other" and typed a response in the blank continued with the survey. A review was conducted of all open-ended answers, including responses to this question and respondents who failed to follow instructions for this question, or gave other non-responsive or nonsense answers to open-ended questions were removed from the final data.

Respondents were then also asked to carefully read these instructions:

- Please take the survey in <u>one</u> session without interruption.
- Please keep your browser maximized for the entire survey.
- While taking the survey, please do not consult any other websites or other electronic or written materials.
- Please answer all questions on your own without consulting any other person.
- If you normally wear eye glasses or contact lenses when viewing a computer screen, please wear them for the survey.

Two options were provided in response to these instructions: 1) I understand and agree to the above instructions, and 2) I do not understand or do not agree to the above instructions. Only respondents who understood and agreed to the instructions then continued to the main section of the survey.

Additionally, the survey program was set up in such a way as to restrict respondents from taking the survey via mobile phones. This contributed to ensuring respondents could easily and clearly view all questions, response options and concepts displayed in the survey.

Question 300 - What company or brand makes or puts out the products shown

Respondents were first asked what company or brand makes or puts out the products they were shown (the Gelish PolyGel products). The following table shows the companies or brands that were named in response to this question by more than one respondent:

Question 300 - Company or brand		
Base N=200	N	%
Gelish	57	28.5%
Polygel	20	10.0%
Sally Hansen	16	8.0%
OPI	16	8.0%
Essie/L'oreal	10	5.0%
CND	4	2.0%
Orly	2	1.0%

The answers of the 20 respondents who named Polygel were examined to determine if there was any reasonable possibility that such respondents were referring to Counter-Plaintiff or its PolyGel mark. As discussed below, all such respondents were subsequently asked whether they are aware of any other products that they think are made or put out by the same company as the products they were shown. Accordingly, respondents who named Polygel in the first question and were thinking of Counter-Plaintiff would have then named the types of products or the brands offered by Counter-Plaintiff. Of the 20 respondents who named Polygel, 19 answered that they are not aware of any other products that come from the same company or that they don't know. The lone respondent who answered that they are aware of other products from the same company named "nail treatment" and "nail polish" and "nail care kit" as the

other products, making clear that she was not thinking of Counter-Plaintiff when she named Polygel.

All 20 respondents who named PolyGel were also asked if they are aware of any other products that use the term PolyGel. Only 2 of these 20 respondents answered affirmatively. One of these two respondents named "Saviland polygel" and the other named "Polygel nail kits." Clearly these answers are not references to products from Counter-Plaintiff.

Accordingly, it is clear that the 20 respondents who initially named "Polygel" when asked about the company or brand that makes or puts out the Gelish products were not thinking of Counter-Plaintiff. To the contrary, these respondents who were not thinking of Counter-Plaintiff and who identified the name they saw on the product shown in the survey (Polygel) were correct about the product brand.

Questions 310/315 - Are the products sponsored or approved by or affiliated with any other company or brand

Respondents were next asked whether they think the products they were shown (the Gelish PolyGel products) are sponsored or approved by or affiliated with any other company or brand. A total of 43 respondents (21.5%) answered affirmatively.

The following table shows the brands that were named by respondents in the follow-up question:

Question 315 - Company or brand		
Base N=200	N	%
Sally Hansen	10	5.0%
OPI	8	4.0%
Gelish	6	3.0%

Essie/L'oreal	5	2.5%
Knockoff of Gelish	1	0.5%
Trugel	1	0.5%
China Glaze	1	0.5%
Revlon	1	0.5%

As the above tables shows, no respondents named Polygel or any other brands owned by Counter-Plaintiff.

Questions 330/335 - Other products from the same company or brand

Respondents were next asked whether they are aware of any <u>other products</u> that they think are made or put out by the same company as the products they were shown (the Gelish Polygel products). A total of 23 respondents (11.5%) answered affirmatively.

The following table shows all other products named by these respondents:

Resp					
<u>ID</u>	Other products named				
11	gel nail poli	sh			
18	Nail Polish				
42	Other Gelis	h products			
46	NAILPOLIS	SH			
	Gelish				
54	polishes	SALLY HANSEN			
	Gelish				
55	Polish	Gelish Polygel			
	gel top	gel	gel	ph	led
101	coat	foundation	polish	bond	lamp
171	nail polish	dip powder			
172	Gel Polish				
182	OPI	Loreal			
205	Gelish nail	polish			
	Nail				
241	Polish	Ulta			
248	gel polish	sns polish	curing	light	

272	Curing lam	ps		
293	sally hansen gel			
	nail			
409	treatment	nail polish	nail care kit	

As the above table shows, none of these respondents identified any product or type of product offered by Counter-Plaintiff.

Questions 350/360 - Other products that use the term PolyGel

Respondents were next asked if they are aware of any other products that use the term PolyGel. A total of 17 respondents (8.5%) answered affirmatively.

The following table shows all other products named by these respondents:

Resp	
ID	Other products named
37	I have seen foreign ripoffs of Gelish
89	Other gelish polishes
151	Trugel
177	sally hansen
196	IBD Just Gel is closest
205	Madam Glam PolyGel
221	Saviland polygel
247	IBD gelpolish
272	Gelish on amazon.com
285	Get Gelish Polygel on ebay and groupon
311	Chinese copies of Gelish polish
330	Dental products
340	Polygel nail kits
359	Gelish knockoffs are all over the place
372	Saviland makes the same
392	Polishes
489	makartt

As the above table shows, none of the other products named refer to products of

Counter-Plaintiff.

Conclusion

Across all survey questions, no respondents gave any answers mistakenly connecting

the Gelish Polygel products to Counter-Plaintiff or any of its products/brands.

Likewise, no respondents had any awareness of any use of the term Polygel in

connection with any of Counter-Plaintiff's products.

Based on the survey results, it is my opinion that there is no likelihood of confusion

among purchasers of professional nail treatment products regarding the source of the

Gelish PolyGel products and that there is no awareness of any use of the term PolyGel

in connection with Counter-Plaintiff's products among purchasers of professional nail

treatment products.

Hal Poret

Dated: October 10, 2018

APPENDIX A

Education

1998 Harvard Law School, J.D., cum laude

- Editor/Writer Harvard Law Record
- Research Assistant to Professor Martha Minow

1995 S.U.N.Y. Albany, M.A. in Mathematics, summa cum laude

- Statistics
- Taught calculus/precalculus/statistics

1993 Union College, B.S. in Mathematics with honors, magna cum laude

- Phi Beta Kappa
- Resch Award for Achievement in Mathematical Research

Employment

2016 - President, Hal Poret LLC

- Design, supervise, and analyze consumer surveys, including Trademark, Trade Dress, Advertising Perception, Consumer Deception, Claims Substantiation studies, Damages, and Corporate Market Research Surveys
- Consulting regarding survey design and review of other surveys
- Provided expert testimony at deposition and/or trial regarding survey research in over 100 U.S. District Court litigations and proceedings in front of TTAB, NAD, FTC and FCC.

2004 - 2015 Senior Vice President, ORC International

 Designed, supervised, and analyzed consumer surveys in legal and corporate market research areas, and provided expert testimony regarding survey research in legal cases.

2003 – 2004 Internet Sports Advantage

• Developed and marketed proprietary internet sports product, and licensed trademark and intellectual property rights.

1998 – 2003 Attorney, Foley Hoag & Eliot, Boston, MA

- Represented corporations and individuals in trademark, trade dress, advertising, product, and related legal disputes.
- Worked with survey experts in developing and using surveys as evidence in trademark, trade dress and advertising disputes.

Testimony at Trial or by Deposition Past 4 Years

(Party who retained me shown in bold)

2018	In re: NCAA Grant-in-Aid Cap Litigatio (Deposition; Trial)	n USDC Northern District of CA
2018	Under Armour v. Battle (Deposition)	USDC District of Maryland
2018	Federal Trade Commission v. D-Link Sy (Deposition)	ystems USDC Northern District of CA
2018	Ezaki Glico v. Lotte International (Deposition)	USDC District of NJ
2018	Car Freshener Corporation v. American (Deposition)	Covers/Energizer Holdings USDC Northern District of NY
2018	Combe v. Dr. August Wolff (Deposition)	USDC Eastern District of VA
2018	In Re GM Ignition Switch Litigation (Deposition)	USDC Southern District of NY
2018	Zetor v. Ridgeway (Trial Testimony Deposition)	USDC Western District of AR
2018	Superior Consulting v. Shaklee (Deposition; Hearing; Trial)	USDC Middle District of FL
2018	Monster Energy Company v. Integrated (Deposition)	Supply Network USDC Central District of CA
2018	Sandoz v. GlaxoSmithkline (Deposition)	USPTO Opposition
2018	JB-Weld v. Gorilla Glue Company (Deposition)	USDC Northern District of GA
2018	Bratton v. The Hershey Company (Deposition)	USDC Western District of MO

2018	Leadership Studies v. Blanchard Traini (Deposition)	ng & Development USDC Southern District of CA
2017	Gulfstream Aerospace v. Gulfstream United (Deposition)	nsinkable Boats USPTO Opposition/Cancellation
2017	Mercado Latino v. Indio (Deposition)	USDC Central District of CA
2017	Delalat v. Nutiva (Deposition)	USDC Northern District of CA
2017	Dashaw v. New Balance (Deposition)	USDC Southern District of CA
2017	Bearing Tech v. O'Reilly Automotive (Deposition)	USDC Western District of MO
2017	Soundview v. Facebook (Deposition)	USDC District of Delaware
2017	Rovi v. Comcast (Deposition)	USDC Southern District of NY
2017	Puma v. Black & Decker (Trial)	New Mexico Circuit Court
2017	Select Comfort v. Personal Comfort (Trial and Deposition)	USDC District of Minn
2017	Alzheimer's Foundation of America v. (Deposition and trial)	Alzheimer's Association USDC Southern District of NY
2017	Banc of California v. Farmers & Mercha (Deposition)	ants Bank USDC Central District of CA
2017	PolyGroup v. Willis Electric (Deposition)	Patent Trial and Appeal Board
2017	Mullins v. Premier Nutrition (Depositions in Class Cert and Merits pl	USDC Northern District of CA nases)
2017	Lion's Gate v. TD Ameritrade	

	(Deposition)	USDC Central District of CA
2017	Deere & Company v. Fimco dba Schabe (Deposition and trial)	en USDC Western District of KY
2017	Adidas & Reebok v. TRB (Deposition)	USDC District of Oregon
2017	Church & Dwight v. SPD (Deposition/trial in liability phase; dep	USDC Southern District of NY osition/trial in damages phase)
2017	In re: Coca Cola Marketing and Sales Pro(Deposition)	ractices Litigation (No. II) USDC Northern District of CA
2017	Ducks Unlimited v. Boondux LLC and (Deposition and Trial)	Caleb Sutton USDC Western District of TN
2017	Globefill v. Element Spirits (Deposition and Trial)	USDC Central District of CA
2017	Brickman v. Fitbit (Deposition)	USDC Northern District of CA
2017	Network-1 Technologies v. Alcatel-Luc (Deposition)	ent et al. USDC Eastern District of TX
2017	Health Partner Plans v. Reading Health (Deposition and Injunction hearing)	Partners USDC Eastern District of PA
2017	In Re Biogen '755 Patent Litigation (Deposition)	USDC District of NJ
2017	Cava Mezze v. Mezze Mediterranean G (Trial)	Grill USDC District of MD
2017	Mastrandrea v. Vizio (Deposition)	USDC Central District of CA
2017	Adidas v. Skechers (Deposition and Injunction hearing)	USDC District of OR
2016	Triumph International, Inc. v. Gourme (Deposition)	etgiftbaskets.com, Inc. USDC Central District of CA

2016	Phelan Holdings v. Rare Hospitality M (Deposition)	anagement USDC Middle District of FL
2016	Intellectual Ventures II v. AT&T Mobil (Deposition)	lity USDC District of DE
2016	One World Foods v. Stubbs Austin Res (Deposition)	taurant Company USDC Western District of TX
2016	Booking.com B.V. v. Michelle Lee (Deposition)	USDC Eastern District of VA
2016	Variety Stores v. Walmart Stores, Inc. (Trial)	USDC Eastern District of NC
2016	American Cruise Lines v. American Qu (Deposition)	ueen Steamboat Company USDC District of DE
2016	Universal Church v. Univ. Life Church (Deposition)	USDC Southern District of NY
2016	U. of Houston v. Houston Col. of Law (Deposition)	USDC Southern District of TX
2016	Navajo Nation v. Urban Outfitters (Daubert Hearing)	USDC District of NM
2016	Beaulieu v. Mohawk Carpet Dist. (Deposition)	USDC Northern District of GA
2016	Efficient Frontiers v. Reserve Media (Deposition)	USDC Central District of CA
2016	McAirlaids v. Medline Industries (Deposition)	USDC Eastern District of VA
2016	Under Armour v. Ass Armor (Deposition)	USDC Southern District of FL
2016	C5 & CoorsTek v. CeramTec (Deposition and trial)	USDC District of Colorado

2016	BBC v. Stander (Deposition)	USDC Central District of CA
2016	Caterpillar v. Tigercat (Deposition)	USPTO Opposition
2016	Premier v. Dish Network (Deposition)	USPTO Opposition
2016	Omaha Steaks v. Greater Omaha (Rebuttal Testimony)	USPTO Opposition
2016	EMC v. Pure Storage (Deposition)	USDC District of MA
2016	Top Tobacco v. North Atlantic (Deposition)	USPTO Opposition
2016	Ascension Health v. Ascension Ins. (Deposition)	USDC Eastern District of MO
2016	Quoc Viet v. VV Foods (Deposition and trial)	USDC Central District of CA
2016	Joules v. Macy's Merchandising Group (Deposition and trial)	USDC Southern District of NY
2015	MMG v. Heimerl & Lammers (Deposition and trial)	USDC District of MN
2015	PRL USA v. Rolex (Deposition)	USDC Southern District of NY
2015	Bison Designs v. Lejon (Deposition)	USDC District of CO
2015	Barrera v. Pharmavite (Deposition)	USDC Central District of CA
2015	Flowers v. Bimbo Bakeries (Deposition)	USDC Middle District of GA
2015	Razor USA v. Vizio	

	(Deposition)	USDC Central District of CA
2015	Allen v. Simalasan (Deposition)	USDC Southern District of CA
2015	BMG Rights Mgmt. v. Cox Enterprises (Deposition and trial)	USDC Eastern District of VA
2015	Verisign v. XYZ.COM LLC (Deposition)	USDC Eastern District of VA
2015	Farmer Boys v. Farm Burger (Deposition)	USDC Central District of CA
2015	Ono v. Head Racquet Sports (Deposition)	USDC Central District of CA
2015	Select Comfort v. Tempur Sealy (Deposition)	USDC District of Minn
2015	ExxonMobil v. FX Networks (Deposition)	USDC Southern District of TX
2015	Delta v. Network Associates (Deposition)	USDC Middle District of FL
2015	Brady v. Grendene (Deposition)	USDC Central District of CA
2015	Zippo v. LOEC (Deposition)	USDC Central District of CA
2015	Maier v. ASOS (Deposition)	USDC District of Maryland
2015	Converse In re: Certain Footwear (Deposition and trial)	International Trade Commission
2014	Scholz v. Goudreau (Deposition)	USDC District of Mass
2014	Economy Rent-A-Car v. Economy Car I (TTAB Testimony)	Rentals USPTO

2014	Weber v. Sears (Deposition)	USDC Northern District of IL
2014	Native American Arts v. Stone (Deposition)	USDC Northern District of IL
2014	Gravity Defyer v. Under Armour (Trial)	USDC Central District of CA
2014	Adams v. Target Corporation (Deposition)	USDC Central District of CA
2014	PODS v. UHAUL (Deposition and trial)	USDC Middle District of FL
2014	Flushing v. Green Dot Bank (Deposition)	USDC Southern District of NY
2014	Amy's Ice Creams v. Amy's Kitchen (Deposition)	USDC Western District of TX
2014	Unity Health v. UnityPoint (Deposition)	USDC Western District of WI
2014	In re: NCAA Student-athlete litigation (Deposition and Trial)	USDC Northern District of CA
2014	Spiraledge v. SeaWorld (Deposition)	USDC Southern District of CA
2014	Diageo N.A. v. Mexcor (Deposition and trial)	USDC Southern District of TX
2014	Pam Lab v. Virtus Pharmaceutical (Deposition and trial)	USDC Southern District of FL
2014	US Soccer Federation v. Players Ass'n (Arbitration Testimony)	Arbitration
2014	Estate of Marilyn Monroe v. AVELA (Deposition)	USDC Southern District of NY

2014	Kelly-Brown v. Winfrey, et al. (Deposition)	USDC Southern Distric	t of NY
2014	Virco Mfg v. Hertz & Academia (Deposition)	USDC Central District	of CA
2014	In re: Hulu Privacy Litigation (Deposition)	USDC Northern Distric	t of CA
2013	Jackson Family Wines v. Diageo (Deposition)	USDC Northern Distric	t of CA
2013	Bubbles, Inc. v. Sibu, LLC. (Deposition)	USDC Eastern District	of VA
2013	Clorox v. Industrias Dalen (Deposition)	USDC Northern Distric	t of CA
2013	Active Ride Shop v. Old Navy (Deposition and trial)	USDC Central District	of CA
2013	Macy's Inc . v. Strategic Marks LLC. (Deposition)	Northern District of CA	L
2013	Karoun Dairies, Inc. v. Karoun Dairies , (Deposition)	Inc. Southern Distric	t of CA
2013	Kraft Foods v. Cracker Barrel Old Coun (Deposition and Trial)	try Northern Distric	t of IL
2013	Bayer Healthcare v. Sergeants Pet Care (Deposition and Trial)	USDC Southern Distric	t of NY
2013	JJI International v. The Bazar Group, In (Deposition)	c. USDC District of	RI
2013	Fage Dairy USA v. General Mills (Deposition)	Northern District of NY	<u>/</u>
2013	Gameshow Network v. Cablevision (Deposition and trial)	F.C.C.	
2013	Telebrands v. Meyer Marketing	USDC Eastern District	of CA

(Deposition)

Presentations

What's New in Advertising Law, Claim Support and Self-Regulation? (ABA Seminar, November 17, 2015)

<u>How Reliable is Your Online Survey</u> (2015 ASRC Annual Conference, September 29, 2015)

What Do Consumers Think? Using Online Surveys to Demonstrate Implied Claims (ANA Advertising Law and Public Policy Conference, April 1, 2015)

<u>Cutting Edge Developments in Trademark Surveys</u> (Rocky Mountain Intellectual Property & Technology Institute, May 30, 2013)

<u>Using Survey Experts in Trademark Litigation</u> (DRI Intellectual Property Seminar, May 9, 2013)

<u>Surveys in Trademark and Advertising Litigation</u> (2013 National CLE Conference, Snowmass Colorado, January 2013)

Internet Survey Issues (PLI Hot Topics in Advertising Law Conference, March 2012)

<u>Measuring Consumer Confusion Through Online Surveys</u> (2011 Midwest IP Institute) (September, 2011)

Online Surveys as Evidence in Trademark Disputes (International Trademark Association Annual Conference, May 2011)

Managing Intellectual Property Trademark Roundtable (April 7, 2010)

<u>Recent Trends in Trademark Surveys</u> (Virginia State Bar Intellectual Property Conference, October 2009)

<u>Trademark Surveys in US Litigation</u> (presentation for International Trademark Association Annual Conference) (May 2009)

<u>How to Conduct Surveys for use in Trademark Disputes</u> (Practicing Law Institute Advanced Trademark Law Conference) (May 2009)

<u>Trademark and Advertising Perception Studies for Legal Disputes</u> (Opinion Research Corporation Seminar, June 2008)

<u>Understanding Advertising Perception Surveys</u> (Promotions Marketing Association Annual Law Conference) (November 2007)

<u>Designing and Implementing Studies to Substantiate Advertising Claims</u> (American Conference Institute Claims Substantiation Conference, October 2007)

Surveys in Trademark and False Advertising Disputes (InfoUSA Webinar, June 2007)

Measuring Consumer Perception in False Advertising and Trademark Cases, (multiple presentations) (2007)

<u>Potential Errors to Avoid In Designing a Trademark Dilution Survey</u> (American Intellectual Property Association paper, April 2007)

<u>Consumer Surveys in Trademark and Advertising Cases</u> (presentation at Promotions Marketing Association Annual Law Conference) (December 2006)

<u>Use of Survey Research and Expert Testimony in Trademark Litigation</u>, (International Trademark Association Annual Conference, May 2006)

<u>Survey Research as Evidence in Trademark/Trade Dress Disputes</u> (multiple presentations) (2006)

<u>Using Surveys to Measure Secondary Meaning of Trade Dress</u>, Legal Education Seminar, Boston, April 2006

Publications/Papers

<u>Cutting Edge Developments in Trademark Surveys</u> (Rocky Mountain Intellectual Property & Technology Institute, May 2013)

Hot Topics and Recent Developments in Trademark Surveys (paper for May 2013 DRI Intellectual Property Conference)

<u>Surveys in Trademark and Advertising Litigation</u> (2013 National CLE Conference, Snowmass Colorado, January 2013)

<u>Trademark Litigation Online Consumer Surveys</u> (Practical Law Company Intellectual Property and Technology, May 2012)

Hot Topics in Advertising Law 2012 (Contributor to Practising Law Institute publication)

<u>A Comparative Empirical Analysis of Online Versus Mall and Phone Methodologies for</u> Trademark Surveys, 100 TMR 756 (May-June 2010)

<u>Recent Trends in Trademark Surveys</u> (paper for Virginia State Bar Intellectual Property conference, October 2009)

<u>Trademark Dilution Revision Act breathes new life into dilution surveys</u> (In Brief PLI website, June 2009)

The Mark (Survey Newsletter; three editions 2009)

<u>Hot Topics in Trademark Surveys</u> (paper for Practicing Law Institute Advanced Trademark Law Conference) (May 2009)

The Mark (Survey Newsletter, 2008)

<u>Trademark and Advertising Survey Report</u> (Summer 2007)

<u>Avoiding Pitfalls in Dilution Surveys under TDRA</u> (AIPLA Spring Conference, Boston, May 2007)

Commentary

Comment on Hotels.com case (on TTABLOG.COM, July 24, 2009)

Comment on Nextel v. Motorola (on TTABLOG.COM, June 19, 2009)

<u>PLI All-Star Briefing Newsletter</u>, "What does the Trademark Dilution Revision Act mean for the future of Dilution Surveys?" (June 2009)

Professional Memberships/Affiliations

American Association of Public Opinion Research

International Trademark Association

National Advertising Division of Council of Better Business Bureaus

APPENDIX B

SCREENER SECTION

BASE: ALL RESPONDENTS

Q50 Insert Captcha [HIDE "YOU ARE HUMAN" SCREEN]

BASE: ALL RESPONDENTS

Q100 Please select your year of birth. [PROGRAMMER: DROP DOWN MENU. TERMINATE IF DOES NOT MATCH PANELIST'S PRELOAD.]

ASK IF: HAS NOT TERMINATED

- Q105 Are you... [CHECK AGAINST PANEL VARIABLE AND TERMINATE IF IT DOES NOT MATCH]
 - 1. Male [TERM]
 - 2. Female [PROGRAMMER: FOR PANEL VARIABLE VERIFICATION]

ASK IF: HAS NOT TERMINATED

Q107 Which of these age ranges includes your age?
[TERMINATE IF UNDER 18 OR IF AGE RANGE NOT POSSIBLE
BASED ON YEAR OF BIRTH ENTERED IN Q100. NOTE - Each
respondent can have two possible ages depending on if respondent's
birthday has passed.]

- 1. Under 18 [TERMINATE]
- 2. 18 to 34 [22%]
- 3. 35 to 54 **[63**%]
- 4. 55 or older [15%]

BASE: ANY NON-TERMINATES

Q109 Which of the following web browsers and search engines, if any, have you used in the past 3 months?

Please select all that apply.

[RANDOMIZE]

- 1. Google Chrome
- 2. Internet Explorer
- 3. Microsoft Edge
- 4. Bing
- 5. Yahoo
- 6. Firefox
- 7. Opera
- 8. Hagelin [TERMINATE]
- 9. Other [ANCHOR]
- 10. Not sure [ANCHOR; EXCLUSIVE]

[Terminate if selects 109/8, or if selects all of 109/1-7.]

ASK IF: HAS NOT TERMINATED

Q110 In what state do you live?

[PROGRAMMER: Drop down menu of states plus D.C. Include an option for "Other" and terminate if it is selected.]

BASE: ANY NON-TERMINATES

Q115 Which of the following types of products, if any, have you personally purchased in the past 6 months, either for yourself or for use in your work?

(Select all that apply or "none of these.")

[RANDOMIZE]

- 1. Nail treatment product
- 2. Hair coloring product
- 3. Facial treatment product
- 4. Teeth whitening product
- 5. No, none of these [ANCHOR; EXCLUSIVE]

BASE: ANY NON-TERMINATES

Q118 Which of the following types of products, if any, are you likely to personally purchase in the next 6 months, either for yourself or for use in your work?

(Select all that apply or "none of these.")

[SHOW IN SAME ORDER AS 115]

- 1. Nail treatment product
- 2. Hair coloring product
- 3. Facial treatment product
- 4. Teeth whitening product
- 5. No, none of these [ANCHOR; EXCLUSIVE]

BASE: ANY NON-TERMINATES

Q120 Do you personally work at a business that does any of the following...? (Select all that apply or "none of these.")

[SHOW IN SAME ORDER AS CORRESPONDING CHOICES IN 115]

- 1. Nail treatments
- 2. Hair coloring treatments
- 3. Facial treatments
- 4. Teeth whitening treatments
- 5. No, none of these [ANCHOR; EXCLUSIVE]

[MUST SELECT 120=1 TO CONTINUE]

BASE: 120=1

Q130 Which of the following best describes the place(s) where you work that does nail treatments?

(Select all that apply)

- 1. Nail salon or spa
- 2. Hair salon
- 3. Full service salon
- 4. Day spa
- 5. Beauty Institute or cosmetology school
- 6. Other [Please Specify]

BASE: 120=1

Q140 Which of the following best describes your job position? (Select all that apply)

- 1. Owner of salon/spa
- 2. Manager of salon/spa
- 3. Employee of salon/spa
- 4. Freelance or independent nail technician
- 5. Other [Please Specify]

BASE: 120=1

Q150 Which of the following do you personally do in connection with any business that does nail treatments?

(Select all that apply)

- 1. Front desk services/reception
- 2. Nail treatments for clients
- 3. Run or manage the business
- 4. Select which nail treatment products to purchase
- 5. Other [Please Specify]

BASE: 120=1

Q155 Which of the following best describes the ethnicity of the owner of the business where you work?

(Select one response)

- 1. Vietnamese
- 2. Korean
- 3. Chinese
- 4. Other Asian
- 5. White/Caucasian
- 6. Other [Please Specify]

ASK IF: HAS NOT TERMINATED

Q160 For quality assurance, please type the word "west" in the blank next to the "Other" box below and then click to continue.

- 1. Strongly agree
- 2. Agree
- 3. Neutral
- 4. Disagree
- 5. Strongly disagree
- 6. Other _____ [DO NOT FORCE TEXT BOX]

[TERMINATE IF SELECTED 160/1-5 OR IF NOTHING ENTERED IN r6.]

ASK IF: HAS NOT TERMINATED

- Q180 You have qualified to take this survey. Before continuing, please carefully read these instructions:
- * Please take the survey in one session without interruption.
- * Please keep your browser maximized for the entire survey.
- * While taking the survey, please do not consult any other websites or other electronic or written materials.
- * Please answer all questions on your own without consulting any other person.
- * If you normally wear eye glasses or contact lenses when viewing a computer screen, please wear them for the survey.
 - 1. I understand and agree to the above instructions
 - 2. I do not understand or do not agree to the above instructions [TERMINATE]

[ONLY QUALIFIED RESPONDENTS SHOULD CONTINUE BEYOND THIS POINT]

[EACH RESPONDENT SHOULD BE RANDOMLY ASSIGNED TO ONLY ONE CELL AND PRIORITIZED BY NEED TO FILL AGE/GENDER QUOTAS]

[PROGRAMMING NOTE: DISPLAY ANY TEXT WITH ITS OWN QUESTION NUMBER ON A SCREEN BY ITSELF UNLESS OTHERWISE SPECIFIED.]

MAIN SURVEY

ASK: ALL

200. On the next screen we are going to show you an image of a set of nail treatment products. Please take your time to review the products. The continue button will not be enabled until 15 seconds have passed to ensure that you have enough time to look at the image.

When you have finished, you will be asked some questions. For any question, if you have no opinion or do not know then please indicate so. Please do not guess.

BASE: ALL QUALIFIED RESPONDENTS

Q250 Please take your time to review this image of nail treatment products.

[INSERT IMAGE 1000 FOR CELL 1 OR IMAGE 2000 FOR CELL 2.]

[DISABLE CONTINUE BUTTON UNTIL 15 SECONDS HAS ELAPSED. SHOW FOLLOWING INSTRUCTION WHILE THE CONTINUE BUTTON IS DISABLED: You will be able to continue after 15 seconds. AFTER 15 SECONDS HAS PASSED, THEN REPLACE THE ABOVE LINE WITH THE FOLLOWING:]

Before continuing with the survey, please indicate whether or not you have viewed the image clearly.

- 1. I viewed the image clearly
- 2. I am unable to view the image clearly [TERMINATE; DO NOT COUNT AS COMPLETE]

ASK: ALL QUALIFIED RESPONDENTS

Q300 What company or brand do you think makes or puts out the products you were just shown, if you have an opinion?

If you are thinking of more than one company or brand, you may enter answers in separate boxes below. If you don't know or have no opinion, you may select that option.

[3 SMALL TEXT BOXES & INCLUDE A "Don't know/No Opinion" OPTION. FORCE AT LEAST ONE TEXT BOX OR DK/NO, BUT DO NOT ALLOW BOTH.]

ASK: ALL QUALIFIED RESPONDENTS

- Q310 Do you think that the products you were just shown are sponsored or approved by, or affiliated with, any other company or brand?
 - 1. Yes, I do
 - 2. No, I do not
 - 3. Don't know/No opinion

ASK IF: Q310=1

Q315 You answered that you think that the products you were just shown are sponsored or approved by, or affiliated with, another company or brand.

What other company or brand?

If you are thinking of more than one company or brand, please enter each one in a separate box below.

[5 SMALL TEXT BOXES & INCLUDE A "Don't know" OPTION. FORCE AT LEAST ONE TEXT BOX OR DK, BUT DO NOT ALLOW BOTH.]

ASK IF: Q315=ENTERED TEXT IN AT LEAST ONE BOX

Q320 Each company or brand you named is listed below. For each one, please explain what makes you think that the products you were just shown are sponsored or approved by, or affiliated with, that company or brand.

Please be as specific and detailed as possible.

[LIST EACH COMPANY/BRAND ENTERED IN Q315 AND TO THE RIGHT OF EACH PROVIDE A LARGE TEXT BOX. ABOVE THE LARGE TEXT BOXES DISPLAY, "Reasons:"]

ASK: ALL QUALIFIED RESPONDENTS

- Q330 Are you aware of any other products or brands that you think are made or put out by the same company as the products we showed you?
 - 1. Yes, I am
 - 2. No, I am not
 - 3. Don't know/No opinion

ASK IF: Q330=1

Q335 You answered that you are aware of other products or brands that you think are made or put out by the same company as the products we showed you.

What other products or brands?

If you are thinking of more than one, please enter each one in a separate box below.

[5 SMALL TEXT BOXES & INCLUDE A "Don't know" OPTION. FORCE AT LEAST ONE TEXT BOX OR DK, BUT DO NOT ALLOW BOTH.]

ASK IF: Q335=ENTERED TEXT IN AT LEAST ONE BOX

Q340 Each product or brand you named is listed below. For each one, please explain what makes you think it is made or put out by the same company as the products we showed you.

Please be as specific and detailed as possible.

[LIST EACH PRODUCT/BRAND ENTERED IN Q335 AND TO THE RIGHT OF EACH PROVIDE A LARGE TEXT BOX. ABOVE THE LARGE TEXT BOXES DISPLAY, "Reasons:"]

ASK: ALL QUALIFIED RESPONDENTS

Q350 Are you aware of any other products that use the term **PolyGel**?

- 1. Yes, I am
- 2. No, I am not
- 3. Don't know/No opinion

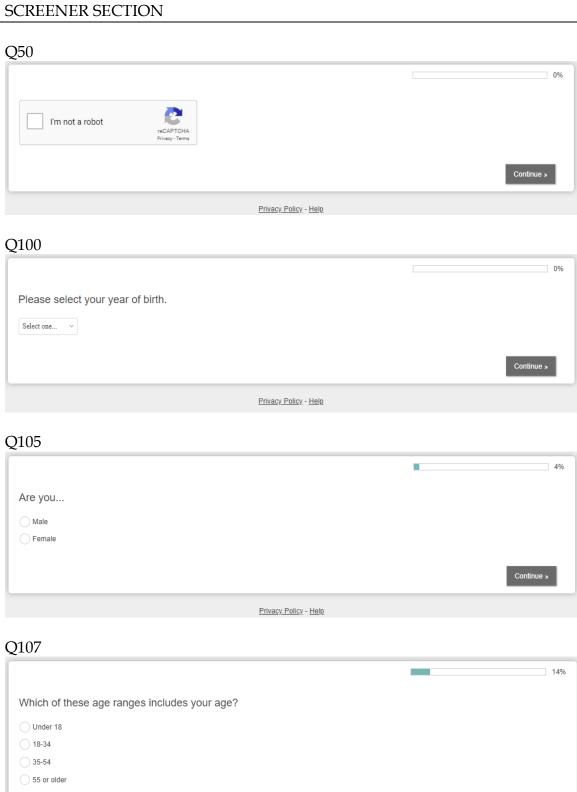
ASK IF: Q350=1

Q360 Using the boxes below, please describe any other products that you are aware of that use the term **PolyGel**.

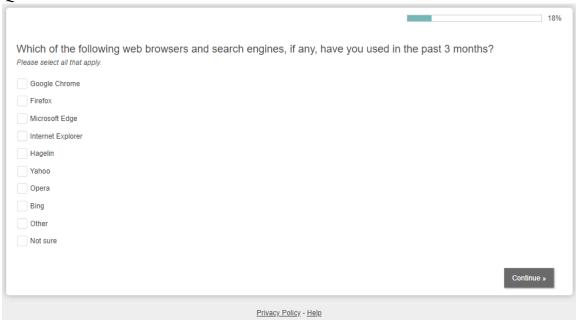
Please be as specific and detailed as possible and identify what <u>type</u> of product you are thinking of.

[5 SMALL TEXT BOXES & INCLUDE A "Don't know" OPTION. FORCE AT LEAST ONE TEXT BOX OR DK, BUT DO NOT ALLOW BOTH.]

APPENDIX C

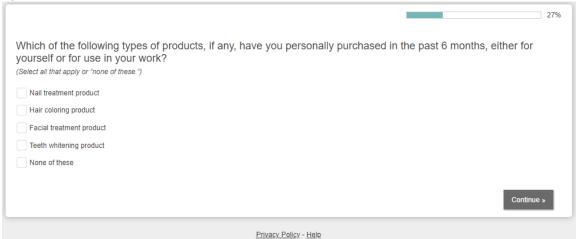


Privacy Policy - Help



Q110





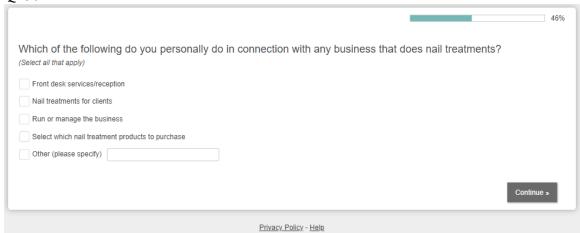
31%
Which of the following types of products, if any, are you likely to personally purchase in the next 6 months, either for yourself or for use in your work? (Select all that apply or "none of these.")
Nail treatment product
Hair coloring product
Facial treatment product
Teeth whitening product
None of these
Continue >
Privacy Policy - Help



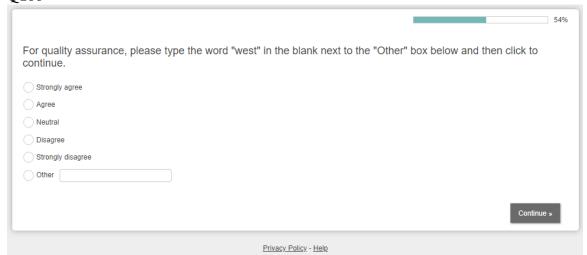
	39%
Which of the following describes the place(s) where you work that does nail treatments? (Select all that apply)	
Nail salon or spa	
Hair salon	
Full service salon	
Day spa	
Beauty Institute or cosmetology school	
Other (please specify)	
Continue :	
Privacy Policy - Help	

Q140





	50%
Which of the following best describes the ethnicity of the owner of the business where you work? (Select one response)	
Vietnamese	
Korean	
Chinese	
Other Asian	
White/Caucasian	
Other (please specify)	
Prefer not to answer	
	Continue »
Privacy Policy - Help	



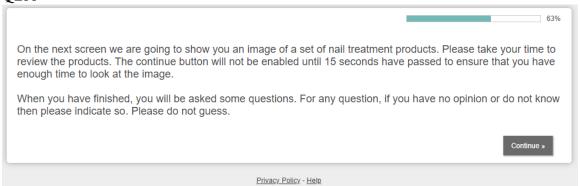
You have qualified to take this survey. Before continuing, please carefully read these instructions:

Please take the survey in one session without interruption.
Please keep your browser maximized for the entire survey.
While taking the survey, please do not consult any other websites or other electronic or written materials.
Please answer all questions on your own without consulting any other person.
If you normally wear eye glasses or contact lenses when viewing a computer screen, please wear them for the survey.

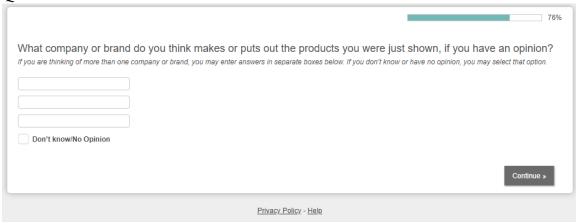
I understand and agree to the above instructions
I do not understand or do not agree to the above instructions

Continue >

MAIN SURVEY

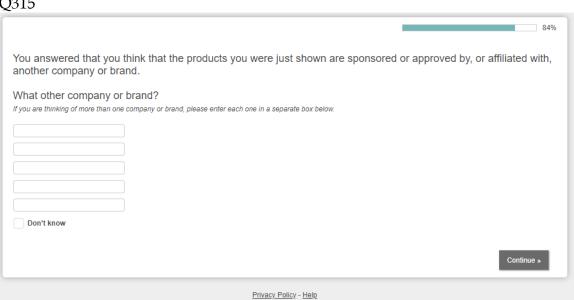


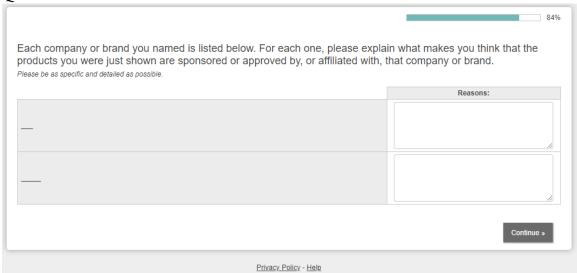




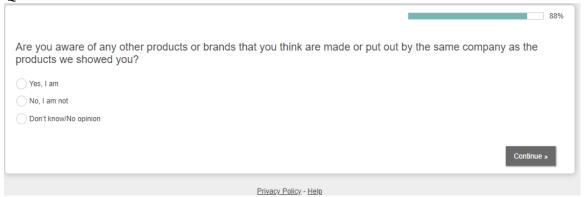
Q310

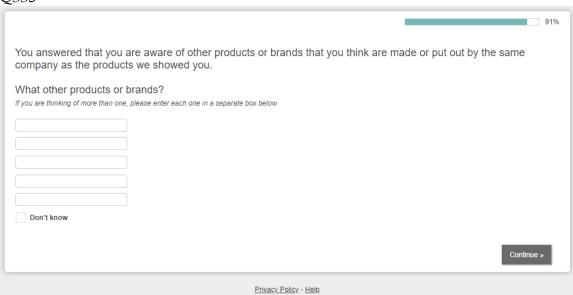






Q330





Q340 Each product or brand you named is listed below. For each one, please explain what makes you think it is made or put out by the same company as the products we showed you. Please be as specific and detailed as possible. Reasons: Privacy Policy - Help Q350 Are you aware of any other products that use the term PolyGel? Yes, I am No, I am not Don't know/No opinion Privacy Policy - Help Q360 Using the boxes below, please describe any other products that you are aware of that use the term PolyGel. Please be as specific and detailed as possible and identify what type of product you are thinking of. Don't know

Privacy Policy - Help

APPENDIX D

record	record	date	status	hQ105	hYear	hAge	
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		0 09/11/2018 09:	3		2	1965	53
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46 29	1971 1988	2	3	0	0	0
41 42	1976 1975	2	3 3	0 0	0	1
52 31	1965 1986	2	3 2	0	0 1	1 0
26 34	1991 1983	2	2	0	1 1	0 1
32	1985	2	2	0	1	0

d107r4	Q109r1	Q109r2	Q109r3	Q109r4	Q109r5	Q109r6	
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	1	1	0	0	0	0	0
	0	1	1	0	0	0	0
	1	0	0	0	0	0	0
	0	1	0	0	0	0	0
	0 1	1 0	1 1	1 0	0 0	1 1	1 1
	0	1	0	1	1	1	1
	0	1	1	0	0	0	Ō
	0	1	0	0	0	0	1
	0	1	1	0	0	1	1
	0	1	1	0	0	1	0
	0	0	0	0	0	0	0
	0	0	1	0	0	1	0
	0	1	0	0	0	0	0
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	1	1	0	0	0	0	0
	1	0	0	0	0	1	Ö
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	0	1	0	1	0	1	0
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	0	1	1	0	1	0	1
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	0	1	0	0	1	0	0
	1 0	1 1	0 1	0 0	0 0	0 0	0 1
	0	1	1	0	0	0	Ō
	1	0	1	0	0	1	Ö
	0	1	1	0	0	1	1
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	0	1	0	0	0	0	0
	0	1	0	0	0	0	0
	0	1	0	0	0	0	1
	0	1	0	1	1	1	1
	0 0 0 0 0	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	0 0 0 1 0 0 0 1 0	0 0 0 1 1 0 0 0 0 0 0 0 0 1 0 0 1 0 0	0 0 0 1 0 0 1 0 1 1	0 0 1 0 0 1 1 1 0 0	1 0 1 0 0 1 0 0 0 1 0 0 0 1 0 0 1 0 0 1 0 0 0 1
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0 0	1 1	0 1	0 1	0 1	1 1	1 1
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0 0	1	0 1	0	1 0	0 0	1 1
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0 0	0 1	1 1	1 1 0	1 0	0 1	0
0	1	1		0	0	0 1
0 0		0	0 0	0	0	1
0	0 1 1 1 0	1 0	0	1 1 0	0 1	0 0
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0 0	1	1 0	1	1 0	1 0	1 1
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0	1	0	0	0	1	0
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0	1 1	0 0	0 1 0	0 1	0 0 0	0 1 0
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0	1	1	1	1 0 0 1 1 1 0	1	1
0	1	1	1	0	0	0
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0	0	0	0	0	1 0 1 0 1 0 1	1
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	1 0 0 1 1 1 1 1 1 0 1 1 1 1 1 1 1 1 1 1	0 0 0 1 0 1 0 1 1 0 1 1 0 0 1 1 0 0 1	0 0 0 1 1 1 1 1 0 0 0 0 0 0 1 1 1 1 0 0	0 1 1 1 0	0 0 0 0 0 1	0 0 1 1 0 0 1 1 1 1 1 1 0 0 0 1 0 0
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	0	0	1	0	41	5	1
	0	0	0	0	33	2	1
	0	0	0	0	1	3	1
	0	0	0	0	43	3	1
	0	0	0	0	20	2	0
	0	0	1	0	48	4	1
	0	0	0	0	33	2	1
	0	0	0	0	48	4	1
	0	0	0	1	33	2	1
	0 0	0 0	0 1	0 0	47 33	5 2	1 1
	0	0	0	0	23	1	1
	0	0	0	0	44	3	1
	0	0	0	0	31	2	1
	0	0	0	0	39	2	0
	Ö	0	0	0	28	4	1
	1	0	0	Ö	6	4	1
	0	0	0	Ö	36	i	1
	0	0	0	0	12	4	1
	0	0	0	0	1	3	0
	0	0	0	0	31	2	1
	0	0	0	0	36	1	0
	0	0	0	0	14	1	1
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	0	0	0	0	19	3	1
	0	0	0	0	14	1	1
	0	0	0	0	11	5	1
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	0	0	0	0	3	4	1
	0	0	0	0	28	4	1
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	0	0	0 0	0	44	3	1
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	0	0	0	0	35 26	2	1 1
	0	0	0	0	3/1	5	1
	0	0	0	Ö	5	Δ	1
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	0	0	0	0	5	4	1

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0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	31 37 6 15	2 3 4 1	1 1 0 1
0 0 0 0	0 0 0 0 0	0 0 0 0	0 0 0 0 0	33 44 33 3 18	2 3 2 4 3	1 1 1 1
0 0 0 0	0 0 0 0 0	0 0 0 0	0 0 0 0	23 19 10 44 41	1 3 5 3 5	1 0 1 1
0 0 0 0 0	0 0 0 0	0 0 0 0 0	0 0 0 0	45 24 11 6 34	4 1 5 4 5	1 1 1 1 1
0 0 1 0	0 0 0 0	0 0 0 0	0 0 0 0	5 5 10 1	4 4 5 3 2 2	1 0 1 1
0 0 0 0	0 0 0 0 0	0 0 0 0	0 0 0 0 0	39 40 10 33 39	5 2 2	1 1 1 1
0 0 0 0	0 0 0 0 0	0 0 0 0	0 0 0 0	10 15 5 11 22	5 1 4 5 2	0 1 1 0 0
0 0 0 0	0 0 0 0	0 0 1 0	0 0 0 0 0 0	36 5 14 7 49	1 4 1 2	1 1 1 1
0 0 0 0	0 0 0 0	0 0 0 1	0	11 39 50	5 2 1 4	1 1
0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	43 6 7 23 44	3 4 2 1 3	1 1 0 1 1 1 1 1
	0 0 0 0 0 0 0 0 0 0 0	0 1 0 0 0 0 0 1 0 0 0 0 0 1 1 0 0 0 0	0 0 0 0 0 0 0 0	38 43 6 7 23 44 1 5 34 38 31 3	1 2 5 5 2 1 4 3 4 2 1 3 4 5 4 2	1 1
0 0	0 0	0	0 0	3	4 5	1 1

0 0 0 0 0 0	0 0 0 0 0 0	0 0 0 0 0 0	0 0 0 0 0 0	25 31 20 44 22 47 36	3 2 2 3 2 5	1 0 1 1 1 0
0 0 0 0 0 0	0 0 0 0 0 0	0 1 0 0 0 0	0 0 0 0 0 0	34 7 11 21 15 5	5 2 5 5 1 4	0 1 0 1 1 1 1
0 0 0 0 0 0	0 0 0 0 0 0	0 0 0 0 0 0	0 0 0 0 0 0	34 14 6 39 50 36 34	5 5 1 4 2 1 1 5	1 1 1 1 1 1
0 0 0 0 0	0 0 0 0 0 0	0 0 0 0 0 0	0 0 0 0 0	15 36 47 23 23 7 23	1 1 5 1 1 2	1 0 1 1 1 0
0 0 0 0 0	0 0 0 0 0 0	0 0 0 0 0	0 0 0 0 0 0	33 39 22 39 33 33	2 2 2 2 2 2 5 2	1 1 1 1 1 1
0 0 0 0 0	0 0 0 0 0 0	0 0 0 0 0	0 0 0 0 0 0 0 0	31 43 44 41 5 36 10	3 3 5 4	1 1 1 1 1
	0 0 0 0 0 0 0 0 0 0 0		0	3 26 24 29 10 37 28	1 5 4 3 1 4 5 3 4	1 0 1 1 1 1
0 0 0 0 0	0 0 0 0 0	0 0 0 0 0	0 0 0 0 0 0 0 0	39 39 29 26 49 50 28	4 5 3 4 2 2 4 3 5 1 4	1 1 1 1 1 1 1 1
0 0 0	0 0 0	0 0 0	0 0 0	30 34 10	4 2 5 5	1 0 1

0 0 0 0 33 2 1			0 0 0 0 1 0 0 0 0 0 0 0 0 0 0 0 0		36 38 6 6 34 36 21 10 15 39 24 3 47 5 37 34 44 10 2 11 33 36	1 4 4 4 5 1 5 5 1 2 1 4 5 4 3 5 4 5 2 1 5 2 3 5 2 3 5 3 5 4 5 2 5 2 5 4 5 2 5 2 5 4 5 5 2 5 4 5 5 2 5 4 5 5 2 5 4 5 5 2 5 2	1 1 1 1 1 1 1 0 1 1 1 1 1 1 1 1 1 1 1 1
0 0 0 55 2 1	0	0	0	0	21	5	1 1 1
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Q115r2	Q115r3	Q115r4	Q115r5	Q118r1	Q118r2	Q118r3	
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	0	0	0	0	1	0	1 0
	1	1	1	0	1	1	1
	0	0	0	1	1	0	Ō
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1 1		1	1	0	1	1	1
1 1 1 0 0 1 0 0 1 0 0 1 0 0 1 0 0 1 0 1 1 0 1		1	1	0	1	1	
0 1 0 1 0 1 0 1 1 0 1 1 1 1 1 0 1 1 1 0 1 1 1 1 1 1 1 1 0 0 0 1	1	1	0	0	1	1	1
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Hidden	Q250	Q300r1	Q300r2	Q300r3	noanswerQ300_Q310	
	1	1 gelish			0	1
	1	1 gelish	poly gel		0	2
	1	1			1	2
	1	1 Poly Gel			0	3
	1	1 Gelish	OPI		0	2
	1	1 L'Oreal			0	3
	1	1 Gelish			0	2
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	1	1 GELFISH			0	3
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	1	1 Gelish			0	3
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	1	1 Gelish	,	•	0	2
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	1	1 Wet N Wild	Sally's	Loreal	0	3
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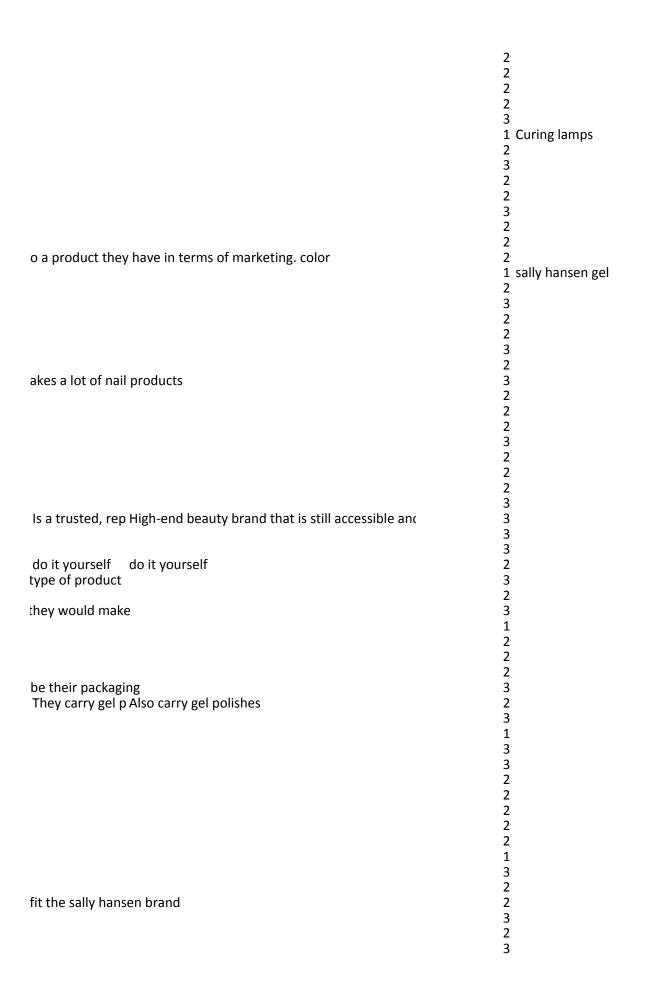
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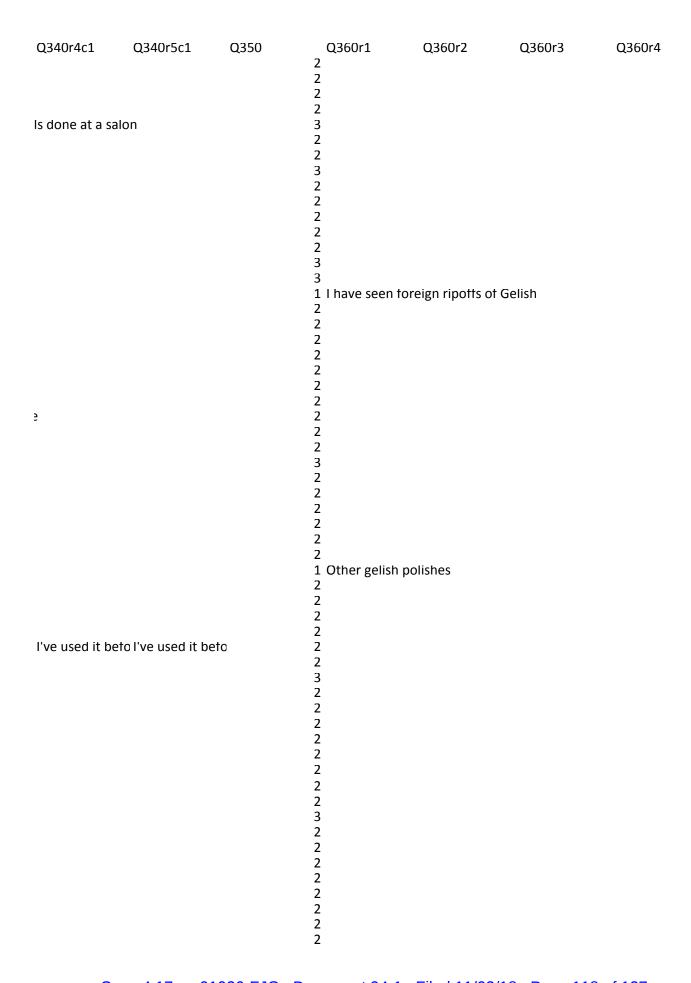
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1 Gelish on amazon.com
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1 Get Gelish Polygel on ebay and groupon
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1 Chinese copies of Gelish polish
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1 Dental products
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1 Polygel nail kits
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1 Gelish knockoffs are all over the place
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1 Saviland makes the same
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APPENDIX E

